

Orrick, Herrington & Sutcliffe LLP

Weimin Ning

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Attorneys for Petitioners Canon Inc.

and Canon U.S.A., Inc.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

Canon Inc. and Canon U.S.A., Inc.,

Petitioners.

v.

Nokia of America Corporation and its
Inventor Employees Krishna
Balachandran, Kumud K Sanwal and
Joseph H. Kang

Respondents

Misc. No. _____

Hon. _____

Underlying Cases:

WSOU Investments, LLC d/b/a

*Brazos Licensing and Development v.
Canon Inc. and Canon U.S.A., Inc.*

Case No. 6:20-cv-00980-ADA

Case No. 6:20-cv-00981-ADA

(W.D. Tex.)

WSOU Investments, LLC d/b/a

*Brazos Licensing and Development v.
Canon Inc. and Canon U.S.A., Inc.;*

Canon Inc. v. NXP USA, Inc.

Case No. 6:20-cv-00980-ADA

(W.D. Tex.)

Motion Day: TBD

**NOTICE OF PETITIONERS' MOTION TO COMPEL COMPLIANCE
WITH SUBPOENAS SERVED ON
NOKIA OF AMERICA CORPORATION AND ITS INVENTOR
EMPLOYEES KRISHNA BALACHANDRAN, KUMUD K SANWAL AND
JOSEPH H. KANG**

**TO: NOKIA OF AMERICA CORPORATION AND ITS INVENTOR
EMPLOYEES KRISHNA BALACHANDRAN, KUMUD K SANWAL,
JOSEPH H. KANG AND THEIR COUNSEL**

PLEASE TAKE NOTICE that Petitioners Canon Inc., with a principal place of business at 30-2, Shimomaruko 3-chome, Ohta-ku, Tokyo 146-8501, Japan, and Canon U.S.A., Inc., with a principal place of business at One Canon Park, Melville, New York, 11747 (collectively, “Canon”), shall move on May 13, 2022 or as soon as counsel may be heard before the United States District Court for the District of New Jersey for an Order to compel Nokia of America Corporation, with a principal place of business at 600 Mountain Avenue, Murray Hill, NJ 07974, to comply with a subpoena issued by Canon on March 3, 2022 and another subpoena accepted by counsel via email on March 17, 2022 pursuant to Fed. R. Civ. P. 45. Petitioners shall also move on May 13, 2022 or as soon as counsel may be heard before the United States District Court for the District of New Jersey for an Order to compel Nokia of America Corporation’s inventor employees—Krishna Balachandran, with an address in 4 Sheffield Ct, Morganville, NJ 07751, Kumud K Sanwal, with an address in 9 Honeysuckle Ln, Edison, NJ 08820, and Joseph H Kang, with an address in 30 Woodview Dr, Belle Mead, NJ 08502—to comply with the subpoenas issued by Canon on March 3, 2022 pursuant to Fed. R. Civ. P. 45.

PLEASE TAKE FURTHER NOTICE that in support of its motion to compel compliance, Canon shall rely upon the Memorandum submitted with this Notice, Declaration of Richard F. Martinelli and any additional submissions in support of this motion made hereafter.

PLEASE TAKE FURTHER NOTICE that a Proposed Order granting Canon's proposed motion is attached.

Dated: April 19, 2022

Respectfully submitted,

/s/ Weimin Ning

Weimin Ning

wning@orrick.com

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LLP**

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*Attorneys for Petitioners Canon Inc.
and Canon U.S.A., Inc.*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that true copies of the foregoing NOTICE OF PETITIONERS' MOTION TO COMPEL COMPLIANCE WITH SUBPOENAS SERVED ON NOKIA OF AMERICA CORPORATION AND ITS INVENTOR EMPLOYEES KRISHNA BALACHANDRAN, KUMUD K SANWAL AND JOSEPH H. KANG and all supporting documents were caused to be served on April 19, 2022 via U.S. mail and electronic mail upon Respondents Nokia of America Corporation and its inventor employees.

Dated: April 19, 2022

Respectfully submitted,

/s/ Weimin Ning

Weimin Ning

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